

Adam D. Brumm, Esq. SBN 257906  
EDEN ENVIRONMENTAL DEFENDERS  
1520 E. Covell Blvd, Suite B5-611  
Davis, CA 95616  
Telephone: (800) 545-7215, Extension 906  
Email: [adam@edendefenders.org](mailto:adam@edendefenders.org)  
Attorneys for Plaintiff

Dana Dean, SBN 226083  
HANSON BRIDGETT LLP  
1676 N. California Blvd., Suite 620  
Walnut Creek, California 94596  
Telephone: 925-746-8460  
Email: [ddean@hansonbridgett.com](mailto:ddean@hansonbridgett.com)  
Attorneys for Defendants

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

CENTRAL VALLEY EDEN  
ENVIRONMENTAL DEFENDERS, LLC, a  
California limited liability company,

Plaintiff,

v.

CASTLE & KING ROCK & READY MIX,  
Inc., et al.,

Defendants.

CENTRAL VALLEY EDEN  
ENVIRONMENTAL DEFENDERS, LLC

Plaintiff,

vs.

CASTLE & KING, a California Corporation,  
et al.,

Defendants.

Case No.: 2:23-cv-02616-SCR

**STIPULATION AND ~~PROPOSED~~  
ORDER TO STAY CASE PENDING  
SETTLEMENT CONFERENCE**

Action Filed: November 13, 2023

Related Case. 2:25-cv-03123 SCR

1 Plaintiff Central Valley Eden Environmental Defenders, LLC (“Plaintiff”) and Defendant  
 2 CASTLE & KING ROCK & READY MIX, Inc., et al., (“Defendant”) (collectively “the Parties”)  
 3 hereby submit this Stipulation to Stay Case Pending the Settlement Conference to be conducted in this  
 4 matter by Magistrate Judge Dennis M. Cota.

5 Plaintiff filed the Complaint in this action on November 13, 2023, alleging violations of the  
 6 Federal Clean Water Act and California’s Industrial General Permit. Defendant has been served and  
 7 filed its Answer on May 29, 2025.

8 On July 15, 2025, the Court entered a Minute Order in this case referring that matter to  
 9 Magistrate Judge Dennis M. Cota for a settlement conference. The date for the settlement conference  
 10 has not yet been confirmed, but is likely to be December 18, 2025.

11 The Parties have not requested any prior continuances or stays in this action.

12 Plaintiff filed a Notice of Related Cases on October 28, 2025, relating this case to *Central Valley*  
 13 *Eden Environmental Defenders v. Castle & King, et al.*, Case No. 2:25-cv-03123-TLN-SCR.

14 Counsel for the Parties have meet and conferred and have agreed that this matter may be  
 15 resolved along with the related case, within the context of the settlement conference to be conducted by  
 16 Dennis M. Cota.

17 Based on the foregoing, the Parties, through their respective attorneys of record, HEREBY  
 18 STIPULATE AND REQUEST an Order from the Court as follows:

- 19 1. That all dates and deadlines currently set in this matter be vacated;
- 20 2. That this action be STAYED until ten (10) calendar days after the conclusion of the  
 21 settlement conference before Magistrate Judge Dennis M. Cota, including any continuances thereto;
- 22 3. That the Parties will meet and confer on or before the expiration of the STAY to (a)  
 23 finalize settlement negotiations and prepare a Notice of Settlement; (b) mutually agree on a request for a  
 24 further stay of the action; or (c) agree that this matter will not settle and prepare a Joint Status Report to  
 25 the Court;
- 26 4. That the Parties will file a Notice of Settlement, Stipulation and Order for Further Stay,  
 27 or Joint Status Report to the Court within five (5) business days after the expiration of the STAY; and  
 28

5. That in the event that the Parties are unable to successfully negotiate a complete resolution of this matter, the Parties will submit a Stipulation to Modify the Scheduling Order with jointly proposed dates .

IT IS SO STIPULATED.

Date: December 9, 2025 HANSON BRIDGETT LLP

/s/ Dana Dean (as authorized on 12/8/25 per LR 131(e))

Dana Dean  
Attorney for Defendants

Date: December 9, 2025 CENTRAL VALLEY EDEN ENVIRONMENTAL DEFENDERS, LLC

/s/ Adam D. Brumm (as authorized on 12/8/25) per LR 131(e)

Adam Brumm  
Attorney for Plaintiff

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

CENTRAL VALLEY EDEN  
ENVIRONMENTAL DEFENDERS, LLC,

Plaintiff,

v.

CASTLE & KING ROCK & READY MIX,  
Inc., et al.,

Defendants.

Case No.: 2:23-CV-02616-SCR

Judge: Honorable Sean C. Riordan

**[PROPOSED] ORDER STAYING CASE  
PENDING SETTLEMENT**

Related Case No. 2:25-cv-03123 SCR

CENTRAL VALLEY EDEN  
ENVIRONMENTAL DEFENDERS, LLC,

Plaintiff,

v.

CASTLE & KING, a California Corporation,  
et al.,

Defendants.

Having considered the Stipulation of the Parties, the Court finds good cause exists to stay this action pending the Settlement Conference to be conducted by Magistrate Judge Dennis M. Cota. IT IS HEREBY ORDERED that the stipulation is approved in its entirety.

1. This Action is hereby STAYED until 12:01 a.m. on the eleventh (11<sup>th</sup>) calendar day after the conclusion of the settlement conference, at which time it will automatically expire unless extended by stipulation of the Parties and order of this Court.

2. All deadlines and hearings currently set in this matter are hereby VACATED, including all pre-trial dates and deadlines.

3. The Parties shall meet and confer on or before the expiration of the STAY to (a) finalize settlement negotiations and prepare a Notice of Settlement; (b) mutually agree on a request for a further

1 stay of the action; or (c) agree that this matter will not settle and prepare a Joint Status Report to the  
2 Court.

3 4. Within five (5) business days after the expiration of the STAY, the Parties shall file a  
4 Notice of Settlement, Stipulation and Order for Further Stay, or Joint Status Report to the Court.

5 5. In the event that the Parties are unable to successfully negotiate a complete resolution of  
6 this matter, the Parties shall file a Stipulation to Modify the Scheduling Order which includes proposed  
7 dates. The Stipulation shall be filed within ten (10) business days after the expiration of the STAY.

8  
9 **IT IS SO ORDERED.**

10 Dated: December 9, 2025

11  
12   
13 SEAN C. RIORDAN  
14 UNITED STATES MAGISTRATE JUDGE  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28